

EXHIBIT 1

From: "Mark C. Mao" mmao@bsflp.com
Subject: RE: Google Tracking Lawsuit
Date: July 28, 2020 at 9:04 PM America/New_York
To: "salcataldo@[REDACTED]">
Cc: "enoch@datadividendproject.com" enoch@datadividendproject.com, James Lee jlee@bsflp.com, "ethan@movehumanityforward.com" ethan@[REDACTED]

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Hi Sal:

So my partner James Lee (copied here) and I are both partners of Boies Schiller Flexner (BSF), and we have been assisting Andrew Yang and Enoch Liang with the Data Dividend Project (DDP). I think you corresponded with Enoch Liang.

Andy and Enoch reached out to the YangGang to get involved in the recent privacy litigation against Google on its surreptitious tracking (see: <https://www.reuters.com/article/us-alphabet-google-privacy-lawsuit/google-faces-lawsuit-over-tracking-in-apps-even-when-users-opted-out-idUSKCN24F2N4>), and they were assisting me and James here in terms of looking for class reps. We are working with a number of federal and state regulators in this area, and with various international authorities. I think everyone agrees that the violations need to stop.

We are hoping that you would be open to being added on as additional class reps, in addition to the class reps already named in the case. Note that this is for the amended complaint only, but DDP and Andy are basically looking to get involved through YangGangers.

Would you potentially be willing to help? If so, I would be happy to send you a copy of the complaint so you can see the allegations. You definitely fall within the class definition.

Thank you in advance.

Mark C. Mao
 Partner

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From: Mark Mao [mailto:markmao@hotmail.com]
 Begin forwarded message:

From: Mark Mao [REDACTED]
Date: July 28, 2020 at 3:20:50 PM PDT
To: Sal Cataldo [REDACTED]>
Cc: Ethan Dunn [REDACTED]
Subject: Re: Google Tracking Lawsuit

Hi Sal -

Honored to have you and Andrew's help. Copying my address at Boies Schiller, where I am the Western Regional lead, and head up the "Google Wars" as we call it at the firm.

This is super helpful. Let me email further from my Boies Schiller address.

And thank you Ethan.

Sent from my iPhone. Please excuse any errors.

**Exhibit
0010
Dunn**

On Jul 28, 2020, at 1:16 PM, Sal Cataldo [REDACTED]> wrote:

Sorry for the delayed response here. Been a very crazy week at home and work.

I'm honestly not sure how long I've had it shut off. I know that there's definitely been a few times where I've shut it off, and then it seems to turn back on.

Specifically, here's how I used to see this go:

I would have it turned off on my chrome on my main computer.

I would get a new device (I'm generally an android guy).

All of a sudden I'd see search history from one device wind up on another, and be confused on how its happening.

Then I'd see the new device was set to sync all devices, INCLUDING settings, so that whatever "default" settings were on the new device would then sync across my google linked devices, which would then override the devices where I had sync turned off, and they would all sync together.

When you first made the post I saw that Delete Psat Activity was still turned off in my privacy, but web & app activity was turned on, even though I thought it had been turned off for years.

I don't keep track of it all that much to know exactly when I turned it off but I know I've never gone back in and turned it on.

And I don't remember when I turned on the delete activity but at least a couple years I want to say.

Very Truly Yours,

Sal J. Cataldo, Esq.
O'Doherty & Cataldo

[REDACTED]

[REDACTED]

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From: Ethan Dunn <[ethan@\[REDACTED\]](mailto:ethan@[REDACTED])>

Sent: Tuesday, July 28, 2020 12:54 PM

To: Sal Cataldo <[markmao@\[REDACTED\]](mailto:markmao@[REDACTED])> | Mark Mao

Subject: Re: Google Tracking Lawsuit

Hi Sal,

Connecting you with Mark Mao, the lead attorney on the google suit. He'll follow up with you to discuss further!

Thanks,
Ethan

On Fri, Jul 24, 2020 at 4:00 PM Ethan Dunn <[ethan@\[REDACTED\]](mailto:ethan@[REDACTED])>
wrote:

Hi Sal,

Just following up here. Have you had the "Web & App Activity" on your google account shut off for quite some time? Or, how long have you had it off?

Let me know. I'll put you in touch with the attorney working on this suit when I hear from you.

Thanks,
Ethan

On Tue, Jul 21, 2020 at 11:11 AM Ethan Dunn
<ethan@> wrote:

Hi Sal,

Thanks for reaching out. Quick question:

How long have you had the "Web & App Activity" setting turned off?

Thanks,
Ethan

On Wed, Jul 15, 2020 at 9:06 PM Sal Cataldo
<salcataldo> wrote:

Hey Ethan,

I saw Ericka's post in the slack about looking for someone who fits the profile of having an android, having a google account, and turning privacy settings to Off/Delete Past Activity, which I've definitely done.

Not sure what other info you need or what you are looking to find out but happy to help any way I can.

Thanks!

Sal

Very Truly Yours,

Sal J. Cataldo, Esq.

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Ethan Dunn

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Ethan Dunn

[REDACTED]

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